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FORT WORTH DIVISION
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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

JUN 16 PM 1:57

4 - 23 CV - 613 - P

Case No. _____

J.A. CASTRO)
Plaintiffs,)
)
v.)
)
JOHN DOE 1 (*a.k.a.* "CHETSFORD"), JOHN) **JURY TRIAL DEMAND**
DOE 2, JOHN DOE 3, and JOHN DOE 4)
)
Defendants.)
)

VERIFIED COMPLAINT

J. A. CASTRO
Plaintiff *Pro Se*
12 Park Place
Mansfield, TX 76063
Tel. (202) 594 - 4344
J.Castro@CastroAndCo.com

TABLE OF CONTENTS

TABLE OF AUTHORITIES	iii
I. PRELIMINARY STATEMENT	1
II. JURISDICTION AND VENUE.....	1
III. PARTIES	2
IV. FACTUAL ALLEGATIONS	2
V. COUNT I: INTENTIONAL TORT- DEFAMATION PER SE.....	5
VI. JURY DEMAND	6
VII. PRAYER FOR RELIEF	6

TABLE OF AUTHORITIES

Cases

<i>Bedford v. Spassoff,</i> 520 S.W.3d 901, 905 (Tex. 2017).....	4
<i>Cohen v. Horn,</i> 2022 WL 1718051 (D.N.J. May 27, 2022), aff'd, 2022 WL 17546950 (3d Cir. 2022).	3
<i>D Mag. Partners, L.P. v. Rosenthal,</i> 529 S.W.3d 429, 434 (Tex. 2017)	
<i>In re Lipsky,</i> 460 S.W.3d (Tex. 2015)).....	3,4
<i>Leyendecker & Assocs. v. Wechter,</i> 683 S.W.2d 369, 374 (Tex. 1984).....	4
<i>Memon v. Shaikh,</i> 401 S.W.3d 407, 421 (Tex. App.—Houston [14th Dist.] 2013, no pet.)	4

Statutes

28 U.S.C. § 1332(a)	2
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J.A. CASTRO)
Plaintiffs,)
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v.)
JOHN DOE 1 (<i>a.k.a.</i> "CHETSFORD"), JOHN) <u>JURY TRIAL DEMAND</u>
DOE 2, JOHN DOE 3, and JOHN DOE 4)
)
Defendants.)
)

VERIFIED COMPLAINT

Plaintiff, J.A. CASTRO (herein "Plaintiff), *pro se*, hereby complains and alleges against JOHN DOES 1, 2, 3, and 4 (hereinafter "Defendants"), as follows:

I. PRELIMINARY STATEMENT

1. Plaintiff brings this action against the as-yet to-be-identified "John Does" who published immensely damaging and defamatory statements against Plaintiff through Wikipedia using a paid Administrator named "Chetsford."
2. Plaintiff seeks to identify the persons responsible and hold them accountable for the publishing of the defamatory statements.
3. Plaintiff seeks an award of compensatory and punitive damages for the harm to his personal and professional reputation, current business interests, and the impairment of business opportunities as a result from the intentionally false defamatory statements and implications about him published by Defendants.

II. JURISDICTION AND VENUE

6. This Court has diversity jurisdiction over these claims under 28 U.S.C. § 1332(a) because (1) the matter in controversy exceeds the value of \$75,000.00, exclusive of interest and costs and, depending on the identity of John Does, (2) the controversy is between individuals that are citizens of different jurisdictions.

III. PARTIES

7. Plaintiff J.A. CASTRO is an individual whose place of residency is in Texas.

8. On information and belief, Defendant John Doe 1, a.k.a., “Chetsford,” is an individual who is not a resident of the state of Texas.

9. On information and belief, Defendant John Doe 2 is an individual who is not a resident of the state of Texas.

10. On information and belief, Defendant John Doe 3 is an individual who is not a resident of the state of Texas.

11. On information and belief, Defendant John Doe 4 is an individual who is not a resident of the state of Texas.

IV. FACTUAL ALLEGATIONS

10. Defendant John Does 3 and 4 hired Defendant John Doe 1, a.k.a. “Chetsford,” to create a Wikipedia page for Plaintiff for the sole purpose of defaming Plaintiff and damaging his reputation.

11. The false information including, but was not limited to, statements that Plaintiff was under federal indictment, which is verifiably false, that Plaintiff was a “sleazy” tax attorney, and that Plaintiff never served in the United States military, which is verifiably false since Plaintiff has a DD-214 with an Honorable Discharge from the United States Army and is legally classified as a Veteran despite the fact that Plaintiff does not identify as a veteran since his wartime service was

while attending the United States Military Academy Preparatory School, which is now located at West Point.

12. Defendant John Doe 2 assisted in the effort by providing false information he had developed over several years to defame Plaintiff. In particular, Defendant John Doe 2 fabricated a document purportedly from the State of Florida that warns Plaintiff not to identify as an International Tax Attorney. The letter is fabricated and likely constitutes a criminal violation in the State of Florida for falsely using the state seal and seemingly official state letterhead.

13. Plaintiff holds two law degrees, one of which is a Master of Laws in Taxation (LL.M.) from Georgetown Law and is a federal practitioner exempt from state bar licensing pursuant to the U.S. Supreme Court holding in *Sperry v. Florida*. For that reason, the Texas State Bar, Florida State Bar, and DC Bar have all acquiesced to Plaintiff holding himself out to the public as an International Tax Attorney. Defendants were aware of this when they falsely published the defamatory statements on Wikipedia.

14. Defendant John Doe 2's motivation was that Plaintiff is an economic competitor. Defendant John Doe 2 is also a tax attorney.

15. Because there is an economic motivation for the false defamatory statements, this is commercial speech. *See Procter & Gamble Co. v. Amway Corp.*, 242 F.3d 539, 552 (5th Cir. 2001), *abrogated on other grounds by Lexmark Int'l, Inc. v. Static Control Components, Inc.*, 572 U.S. 118 (2014). As such, Plaintiff need not show actual malice. Nevertheless, Plaintiff intends to establish actual malice for the purpose of convincing the jury to impose steep punitive damages.

16. Defendants published false and defamatory statements not once, but repeatedly over a substantial period of time.

17. Defendants knowingly and intentionally relied on and used unreliable sources to perpetuate the defamatory statements about Plaintiff.

18. Defendants acted with actual malice in publishing the knowingly false information.

19. Defendants entertained serious doubts about the truthfulness of the statements but published them anyways.

20. Defendants' statements are reasonably understood to be statements of fact about Plaintiff, and were understood by people who saw, heard, and read them to be statements of fact about Plaintiff.

21. Defendant's knowingly false defamatory statements, if taken individually or together in their cumulative impact, damaged Plaintiff in the various ways described herein.

22. Defendant published statements were not in connection with a public figure or person who has drawn substantial public attention due to notoriety. Plaintiff has only received minimal public attention from a few obscure media outlets.

23. Defendant's published statements were not in connection with a subject of concern to the public.

24. The matter of public concern was used as a pretext to publish statements that are not a subject of concern to the public.

25. Defendant's published statements were a personal attack on Plaintiff unrelated to any subjects of concern to the public.

26. Defendants' actions were done with malicious bad-faith and with the intent to irreparably damage Plaintiff's reputation.

27. As such, Defendants' actions were not in furtherance of any constitutionally protected rights.

V. COUNT I: INTENTIONAL TORT- DEFAMATION PER SE

20. Plaintiff repeats, reiterates, and re-alleges each and every allegation above as though set forth herein.

21. Under Texas law, to prevail on a defamation claim, a plaintiff must establish that: “(1) the defendant published a false statement; (2) that defamed the plaintiff; (3) with the requisite degree of fault regarding the truth of the statement (negligence if the plaintiff is a private individual); and (4) damages (unless the statement constitutes defamation *per se*).” *D Mag. Partners, L.P. v. Rosenthal*, 529 S.W.3d 429, 434 (Tex. 2017) (citing *In re Lipsky*, 460 S.W.3d 579, 593 (Tex. 2015)).

22. Further, in any defamation case, a threshold legal question is whether the challenged publication is defamation *per se* or defamation *per quod*. See *In re Lipsky*, 460 S.W.3d at 596 (observing that “whether a statement qualifies as defamation per se is generally a question of law”). A statement is considered defamation *per se* if, on its face, it falls within one of the following four categories: (1) it falsely charges a person with the commission of a crime, see, e.g., *Leyendecker & Assocs. v. Wechter*, 683 S.W.2d 369, 374 (Tex. 1984); (2) it falsely imputes that a person has a loathsome disease, see, e.g., *Memon v. Shaikh*, 401 S.W.3d 407, 421 (Tex. App.—Houston [14th Dist.] 2013, no pet.); (3) it falsely imputes sexual misconduct, see, e.g., *id.*; or (4) it injures a person in their office, profession, or occupation, see, e.g., *Bedford v. Spassoff*, 520 S.W.3d 901, 905 (Tex. 2017). Damages are presumed if the publication is defamation *per se*. *In re Lipsky*, 460 S.W.3d at 596.

23. Defendant knew that the statements were false and acted with either reckless disregard for the truth or with actual malice by publishing the knowingly false information.

24. Defendant’s defamatory statements were accompanied with malice, wantonness, and a conscious desire to cause injury.

25. Defendant's lies about Plaintiff were specific and verifiably false, and therefore not "opinion."

26. Plaintiff sustained serious reputational damages to his professional career.

27. By reason of the foregoing act of Defendant, Plaintiff is entitled to actual, presumed, punitive, and other economic damages in an amount to be specifically determined at trial.

VI. JURY DEMAND

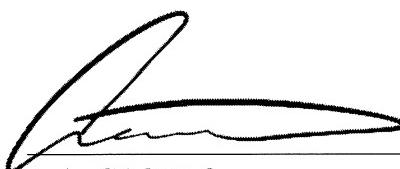
Plaintiff hereby demands a trial by jury as to all issues so triable.

VII. PRAYER FOR RELIEF

WHEREFORE, upon all facts and circumstances herein alleged, Plaintiff respectfully requests that this Court:

- A. Granting Plaintiff's motion for leave to serve process by internet notification in Wikipedia, permitting the use of a subpoena to Wikipedia to identify the Internet Protocol (IP) addresses utilized by Defendant John Doe 1, *a.k.a.*, Chetsford, over the last 24 months, permitting the use of a subpoena to his Internet Service Provider (ISP) to identify his true identity, and subjecting him to a deposition to uncover the identity of Defendant John Doe 2 who hired him.
- B. Grant judgment against Defendants on each and every cause of action alleged herein;
- C. Grant an order awarding Plaintiff damages in an amount to be determined at trial, together with interest and the costs and disbursements of this action, punitive damages, as well as any other damages permitted to be recovered by law pursuant to the above causes of action not less than \$180,000,000.00 for (1) lost profits; (2) lost enterprise value, and (3) punitive damages; and
- D. Grant any such further relief as the Court deems just, proper, and equitable.

Dated: June 16, 2023



J. A. CASTRO
Plaintiff *Pro Se*
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The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

J.A. Castro

(b) County of Residence of First Listed Plaintiff
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Pro Se, 13155 Noel Road, Suite 900, Dallas, Texas 75240
(202) 594-4344**DEFENDANTS**JOHN DOE 1 (a.k.a. "CHETSFORD") JOHN DOE 2, JOHN
DOE 3, AND JOHN DOE 4
County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)
Unknown
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- | | |
|--|--|
| <input type="checkbox"/> 1 U.S. Government Plaintiff | <input type="checkbox"/> 3 Federal Question
(U.S. Government Not a Party) |
| <input type="checkbox"/> 2 U.S. Government Defendant | <input checked="" type="checkbox"/> 4 Diversity
(Indicate Citizenship of Parties in Item III) |

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State	PTF	DEF	PTF	DEF
<input checked="" type="checkbox"/> 1	<input type="checkbox"/>	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4 <input type="checkbox"/>
<input type="checkbox"/> 2	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5 <input type="checkbox"/> 5
<input type="checkbox"/> 3	<input type="checkbox"/>	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	PROPERTY RIGHTS	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input checked="" type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	LABOR	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 720 Labor/Management Relations	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury		<input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice			<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise				<input type="checkbox"/> 850 Securities/Commodities/ Exchange
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	SOCIAL SECURITY	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	Habeas Corpus:	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 863 DIWC/DIW (405(g))	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	Other:	FEDERAL TAX SUITS	<input type="checkbox"/> 950 Constitutionality of State Statutes
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	
		<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 871 IRS—Third Party	
		<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 26 USC 7609	
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

- | | | | | | | |
|---|---|--|---|--|--|---|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from Another District (specify) | <input type="checkbox"/> 6 Multidistrict Litigation - Transfer | <input type="checkbox"/> 8 Multidistrict Litigation - Direct File |
|---|---|--|---|--|--|---|

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. § 1332(a)

VI. CAUSE OF ACTION

Brief description of cause:

John Doe 1 and John Doe 2 published defamatory statements against Plaintiff

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION
UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

06/16/2023

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFFP

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If a related case exists, whether pending or closed, insert the docket numbers and the corresponding judge names for such cases. A case is related to this filing if the case: 1) involves some or all of the same parties and is based on the same or similar claim; 2) involves the same property, transaction, or event; 3) involves substantially similar issues of law and fact; and/or 4) involves the same estate in a bankruptcy appeal.

Date and Attorney Signature. Date and sign the civil cover sheet.